

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

LEONITUS JABIR BEY,  
Plaintiff,

C.A. NO.: 19-10219- PBS

v.

DAVID PENDER,  
Defendant

**DEFENDANT'S MOTION IN LIMINE TO PREVENT THE  
*PRO SE* PLAINTIFF FROM CALLING WITNESSES  
WHO HE HAS REFUSED TO IDENTIFY OR PROVIDE ADDRESSES**

In the incident which is the subject matter of this lawsuit, the *pro se* plaintiff was operating a motor vehicle with a passenger who was involved in the incident someone by the name of Pathfinder Bey. The *pro se* plaintiff was asked for the address of Pathfinder Bey at his deposition on May 20, 2020 and said he was in Florida but knew nothing beyond that (deposition of the *pro se* plaintiff, pp. 24-25).

16 Q. And who is Pathfinder Bey?

17 A. He is my Co-Defendant, person in the car -- the

18 guest that was in the car with me, the guest who

19 recorded the entire incident.

20 Q. Okay, what is his address?

21 A. He is in Florida currently.

22 Q. Do you know what his address is in Florida?

23 A. I do not.

24 Q. Do you know what town he lives in?

25 A. I do not.

On May 5, 2021, the defendant invited the *pro se* plaintiff to a discovery conference to provide all information relative to any claim for medical injury/counseling and identities of witnesses in further response to answers to Interrogatories and Requests for Production of Documents and the discovery testimony. The *pro se* plaintiff has not responded. A motion to

compel is pending.

Wherefore the defendant moves for an order prohibiting the plaintiff from calling Pathfinder Bey as a witness.

The Defendant,

By his attorney,

*/s/Bradford N. Louison*

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Boston, MA 02110  
(617) 439-0305

Date: June 9, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, I caused the foregoing to be served by first class mail or via email to:

Leonitus Jabir Bey  
P.O. Box 1934  
Lowell, Mass 01854  
ryamexum@gmail.com

*/s/Bradford N. Louison*

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Bradford N. Louison

Dated: June 9, 2021